IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

BEAR CREEK BIBLE CHURCH et al.,

Plaintiffs,

v.

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION et al.,

Defendants.

Civil Action No. 4:18-CV-824-O

<u>DEFENDANTS' RESPONSE IN OPPOSITION TO PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT AND PERMANENT INJUNCTION</u>

Defendants Equal Employment Opportunity Commission et al. respectfully file this Response in Opposition to Plaintiffs' Motion for Summary Judgment and Permanent Injunction, ECF No. 72. Each of the matters required by Rule 56.4(a) of the Local Civil Rules is set forth in the accompanying brief.

Dated: June 28, 2021 Respectfully submitted,

BRIAN M. BOYNTON Acting Assistant Attorney General Civil Division

CARLOTTA WELLS
Assistant Branch Director
Civil Division, Federal Programs Branch

Benjamin T. Takemoto

BENJAMIN T. TAKEMOTO
(DC Bar # 1045253)
MICHAEL F. KNAPP
(CA Bar. # 314104)
Trial Attorneys
United States Department of Justice
Civil Division, Federal Programs Branch

P.O. Box No. 883, Ben Franklin Station

Washington, DC 20044 Phone: (202) 532-4252 Fax: (202) 616-8460

E-mail: benjamin.takemoto@usdoj.gov

Attorneys for Defendants

CERTIFICATE OF SERVICE

On June 28, 2021, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2) or the local rules.

Benjamin T. Takemoto BENJAMIN T. TAKEMOTO